

P.O. Box 1970 Richland, WA 99352

May 26, 1994

9403139B R1

Mr. K. M. Thompson, Acting Director Environmental Remediation Division U.S. Department of Energy Richland Operations Office Richland, Washington 99352

Dear Mr. Thompson:

N AREA PILOT PROJECT



Reference: Letter, R. D. Freeberg, RL, to President, WHC, same subject, 94-HRB-116, dated May 6, 1994. 0036 175

This letter is to acknowledge receipt of your referenced letter. Westinghouse Hanford Company (WHC) can meet the directions given in the letter except for the following comments requiring clarification.

Item 4, paragraph 2. Work to October 1994 milestones to submit 100-NR-01 and 100-NR-02 of the (RCRA) Facility Investigation Corrective/Measures Study Work Plan to DOE for Ecology and EPA approval, in accordance with their respective authorities under the Tri-Party Agreement. Data collected under previously approved field investigation statements of work will be included. The 100-NR-01 Work Plan will also include a proposed Limited Field Investigation (LFI) for the 1301/1325 and 1324 N/NA sites, incorporating site descriptions, contaminant conceptual model, the existing data base, the data quality objectives and work descriptions for proposed investigations for these facilities. Existing LFI data for 100-NR-01 and 100-NR-02 will be integrated. Activities to address skyshine will also be included. Schedules will be provided for all operable unit activities, including the new proposed investigations at 1301/1325, 1324 N/NA, and for skyshine abatement. Such schedules are subject to changes to the Work Plan when approved. Qualitative risk assessments will be performed after work plans are approved and the submittal date(s) will be included in the schedules provided in the work plans.

1. The WHC October 31, 1994 schedule for the NR-1 and NR-2 work plan submittal to U.S. Department of Energy, Richland Operations Office (RL), assumes a concurrent RL/State of Washington Department of Ecology (Ecology)/U.S. Environmental Protection Agency (EPA) review. If RL desires a separate review cycle prior to the October 31, 1993, submittal date, please advise.

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2. The existing Limited Field Investigation (LFI) data from previous field investigations will be integrated into the work plans as requested. However, an LFI report and Qualitative Risk Assessment for those sites will be needed eventually in order to document Information Resource Management decisions. WHC proposes to prepare that document in 1995 concurrent with the 1301-N/1325-N LFI report. Schedules will be provided in the work plan as requested.

Item 7, paragraph (a). Submit by May 31, 1994, as a letter report, the results of saturated flow groundwater modeling of the impacts of installing a semi-permeable barrier (simulating a grouted-hinge sheet pile barrier) at the closest location practicable to the Columbia River at N Springs and the impacts of a two potential pump and treat systems (pilot-scale as defined in 5(b) and 150 gallons/minute). Ecology, EPA and DOE will agree on modelling inputs.

- 1. This modeling effort is scheduled to start June 1, 1994. A letter report can be submitted by July 11, 1994.
- 2. It will be assumed the pilot-scale referenced as 5(b) should be 7(b). The pump and treat system modeling will be completed October 31, 1994. A letter reporting on the results can be submitted by November 8, 1994.

Item 7, paragraph (d). Submit by July 29, 1994, as a letter report, to Ecology and EPA for review and comment a conceptual design and cost estimate of a grouted-hinge sheet pile barrier and the two pump and treat systems (pilot-scale as defined in 5(b) and 150 gallons/minute) including effluent and waste disposal. Given an operating efficiency goal of 90%, the pump and treat system will be automated, with influent and effluent continual radiological monitoring and monthly laboratory confirmatory samples, and will have operating procedures and health & safety plans in place prior to hot startup. The Tri-Parties agreed to strive for an effluent concentration of less that 42 pCi/L Strontium-90; however, such a goal may be limited by technology. Effluents will be discharged either to the ground or to the Ringold Formation within the boundaries of the 100-NR-01 Operable Unit, subject to Ecology approval.

- 1. WHC is not preparing a grouted-hinge, sheet-pile wall barrier conceptual design. WHC is preparing a design and construct procurement specification. This specification will be submitted for EPA and Ecology review and approval prior to release for bid. This additional review will impact the project schedule by the review duration (two weeks).
- 2. The pump and treat system will have a design and construct procurement specification prepared. This will not be started until the modeling effort is completed.

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Item 7, paragraph (e). Concurrently, Ecology will review the results of the modeling, the assessment of wells, the assessment of the documents, and public comments to the N Springs Expedited Response Action Proposal, DOE/RL-93-23, Revision O. From these efforts, Ecology will respond to public comments and issue a draft Action Memorandum.

1. The Action Memorandum is going through the regulator signature approval cycle at this time. The well-assessment report and new modeling results will not be available for Ecology to review prior to release of the Action Memorandum. A date for the availability of this information will be established after receipt of the Action Memorandum.

If you have any questions, please contact Mr. R. J. Gimera on 373-4164, or Mr. M. J. Lauterbach on 376-5257.

Very truly yours,

M. C. Hughes, Maylager 100 Area Projects

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